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June 8, 2022

By ECF

The Honorable Hector Gonzalez
United States District Court Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Request for Oral Argument, *Wildman v. Deutsche Bank*
Aktiengesellschaft, et al., No. 21 Civ. 4400 (E.D.N.Y.)
(HG) (RML)

Dear Judge Gonzalez:

I represent defendants Standard Chartered Bank, Standard Chartered PLC, and Standard Chartered Bank (Pakistan) (collectively, “SCB Defendants”) in the above-captioned matter, and I write on behalf of my clients to request oral argument on the SCB Defendants’ pending Motion to Dismiss the Amended Complaint.

As Your Honor was advised in the May 31, 2022 Letter filed on behalf of the SCB Defendants and the other defendants that have appeared in this matter (Danske Bank A/S, Danske Markets Inc., Deutsche Bank Aktiengesellschaft, Deutsche Bank Trust Company Americas, and Placid NK Corporation d/b/a Placid Express) (collectively, “Defendants”) (ECF No. 42), prior to the reassignment of this matter to Your Honor, the presiding judge, Judge Matsumoto, had held a pre-motion conference on December 7, 2021 and set a briefing schedule whereby Defendants’ motions to dismiss would be due March 18, 2022; Plaintiffs’ oppositions would be due May 13, 2022; and Defendants’ replies would be due June 3, 2022. (Dec. 7, 2021 Minute Entry.) Those papers have all been filed.

The SCB Defendants recognize that, per Your Honor’s Individual Practices, Your Honor directs that “[p]arties may request oral argument by noting “Oral Argument Requested” in their Notice of Motion or opposing memorandum[.]” (Individual Practices IV.C.) The SCB Defendants did not include such a request in their Notice of Motion because the SCB Defendants were following Judge Matsumoto’s Individual Practices, which state that “[a] party seeking oral argument on a motion shall

file a separate letter, titled ‘Request for Oral Argument,’ at the time the fully-briefed motion is filed on ECF.” (Chamber Practices of Judge Kiyo Matsumoto III.E.)

Because the SCB Defendants intended to file a letter requesting oral argument consistent with Judge Matsumoto’s Individual Practices, the SCB Defendants respectfully request that Your Honor excuse the differences from your Individual Practices and accept this letter as the SCB Defendants’ timely request for oral argument on the SCB Defendants’ pending Motion to Dismiss the Amended Complaint.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink that reads "Andrew J. Finn". The signature is written in a cursive, flowing style.

Andrew J. Finn

cc: All Counsel of Record (by ECF)